



CATEX CHECKLIST

CHECKLIST OF EXTRAORDINARY CIRCUMSTANCES & SENSITIVE RESOURCES IN SUPPORT OF A CATEGORICAL EXCLUSION (CATEX) DETERMINATION FOR A DENALI COMMISSION PROJECT

Program Partner Name Alaska Native Tribal Health Consortium (ANTHC)		Project Name Sanitation Energy Efficiency	
Location Statewide, Alaska		Project # FAA 1467-05	Subproject # Amendment 5
Identify Categorical Exclusion <p>The proposed project is identified in the Denali Commission list of categorical exclusions in 45 CFR Appendix A to Part 900, paragraph(s) 10th paragraph on page 53039. <i>"B1. Upgrade, repair, maintenance, replacement, or minor renovations and additions to buildings...that do not result in a change in the functional use of the real property."</i></p>			
Project Description (2-3 sentences maximum) <p>This amendment No. 3 accounts for the Commission's FAA 1467-05 award: the grant period of performance to December 31, 2019 was extended; increases the project budget by \$500,000; adds additional scope to existing cost estimate table line items; and adds an additional cost estimate table line item of wind-to-heat integration upgrades.</p>			
Instructions <p>The information you provide below will assist the Denali Commission in making its determination as to whether a Categorical Exclusion (CATEX) is appropriate or further environmental analysis is required for the proposed project. Please place a checkmark in the blank next to the numbered items indicating your response on that issue. A checkmark in the "Yes" block does not automatically preclude the development of the proposed project. It simply means further assessment is needed. Should you have any remarks that may indicate the need to prepare an Environmental Analysis (EA) or an Environmental Impact Statement (EIS), attach a brief explanation of the circumstances for further evaluation. Adverse effects to environmentally sensitive resources must be resolved through another environmental process, e.g., coordination or consultation under the Coastal Zone Management Act or National Historic Preservation Act, before being categorically excluded. Attachments are allowed and encouraged.</p>			

Extraordinary Circumstances	Determination		Basis for determination
	Yes	No	
1. Public Health, Safety or Environment <p>Will the proposed project have a reasonably likelihood of significant impacts on public health, public safety, or the environment?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>No. The proposed project is typical in scope in comparison with other rural Alaskan energy efficiency projects and has no unusual, significant characteristics. Energy efficiency retrofits may expose workers to lead-based paint (LBP), asbestos-containing material (ACM), and polychlorinated biphenyls (PCBs), particularly when performing retrofits in structures built before 1980. Before retrofits of structures occur, facilities known or suspected to contain LBP, ACM, PCBs, or other hazardous materials shall be assessed by certified workers. Workers performing retrofits shall be equipped with site-appropriate personal protective equipment (PPE). Waste generated from the retrofits shall be disposed of in an ADEC-permitted solid waste facility.</p>
2. Controversy on Environmental Grounds <p>Will the proposed project have effects on the environment that are likely to be highly controversial or involve unresolved conflicts concerning alternative uses of available resources?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>No. The proposed project will comply with all applicable laws and requirements and will have appropriate regulatory approvals.</p>

3. Uncertain, Unique or Unknown Risks Will the proposed project have possible effects on the human environment that are highly uncertain, involve unique or unknown risks, or are scientifically controversial?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No. The proposed project will not use methods or materials for which there are uncertain, unique, or unknown risks.
4. Precedent for Future Action Will the proposed action establish a precedent for future action or represent a decision in principle about future actions with potentially significant environmental effects?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No. The proposed project is consistent with other rural Alaskan sanitation, energy audit and assessment, energy efficiency retrofit, and heat recovery system design projects.
5. Cumulative Impacts Will the proposed project relate to other actions with individually insignificant but cumulatively significant environmental effects?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No. The proposed project will not cause cumulative impacts that will result in degradation of environmental concerns as outlined in NEPA.
6. Scope and Size Will the proposed project have a greater size and scope than is normal for the category of action?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No. The proposed project is not greater in size or scope relative to other rural Alaskan sanitation, energy audit and assessment, energy efficiency retrofit, and heat recovery system design projects.
7. Environmental Conditions Will the proposed project have the potential to degrade already existing poor environmental conditions or to initiate a degrading influence, activity or effect in areas not already significantly modified from their natural condition?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No. The environmental impacts of the proposed energy audit and assessment, energy efficiency retrofit, and heat recovery system feasibility study and design will not degrade already existing poor environmental conditions or lead to degradation of the environment.
8. Environmental Justice Will the proposed project have a disproportionately high and adverse effect on low income or minority populations? Ref: Executive Order 12898, Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No. This project will benefit low income and minority populations throughout Alaska by working directly with rural communities to improve the sustainability and the lower operating costs of rural sanitation systems.
9. Indian Sacred Sites Will the proposed project limit access to or ceremonial use of Indian sacred sites by Indian religious practitioners or adversely affect the physical integrity of such sacred sites? (EO 13007) <i>"Indian tribe" means an Indian or Alaska Native tribe, band, nation, pueblo, village, or community that the Secretary of the Interior acknowledges to exist as an Indian tribe pursuant to Public Law No. 103-454, 108 Stat. 4791, and "Indian" refers to a member of such an Indian tribe. (EO 13007)</i> Ref: Executive Order 13007, Indian Sacred Sites	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No. Project activities are restricted to training, audits and data gathering, and upgrades to existing appurtenances in existing water treatment plants. There is no potential for the project to affect access to, or use of, ceremonial sites.
Sensitive Resources	Impact Potential		Basis for determination
	Yes	No	

<p>10. Section 106 Historic Properties</p> <p>Will the proposed project adversely affect properties in, or eligible for inclusion in, the National Register of Historic Places?</p> <p>Ref: National Historic Preservation Act of 1966 (16 U.S.C. 470 et seq.), as amended. (See 36 CFR 800, Protection of Historic Properties).</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>No. Project activities are restricted to training, audits and data gathering, and upgrades to existing appurtenances in existing water treatment plants. Any changes to the project scope that add ground disturbing activities or modifications to structures or buildings will require a separate evaluation.</p>
<p>11. Endangered Species</p> <p>Will the proposed project adversely affect species listed, or proposed to be listed on the Endangered or Threatened Species List, or the specific critical habitat?</p> <p>Ref: Endangered Species Act of 1973 (16 U.S.C. 1531 et seq.), as amended. (See 50 CFR part 402).</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>No. If construction activities will occur outside of buildings, a Section 7 consultation via USFWS' Information for Planning and Conservation (IPaC) website may be necessary. Construction and land clearing activities shall follow the USFWS' "Construction Advisory for Protecting Migratory Birds" available at http://www.fws.gov/alaska/mbmp/mbm/index.htm and if an eagle nest is discovered within 660 feet of any locations where exterior construction will take place, USFWS shall be consulted.</p>
<p>12. Historic or Cultural Resources</p> <p>Will the proposed action adversely impact the historic and cultural environment of the Nation?</p> <p>Ref: Executive Order 11593, Protection and enhancement of the cultural environment.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>See remarks under no. 10.</p>
<p>13. Park, Recreation or Refuge Lands</p> <p>Will the proposed project have significant adverse direct or indirect effects on National or State Park, Recreation or Refuge lands?</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>No. Although some of the communities served by this project are located in or near park, recreation, or refuge lands, the proposed actions will occur within the communities' limits, in previously developed areas where construction activities are unlikely to result in anything more than localized, short-term effects (e.g., dust and noise generation). http://alaska.fws.gov/nwr/map.htm; http://www.nps.gov/state/ak/; http://www.dnr.state.ak.us/parks/units/index.htm</p>
<p>14. Wilderness Areas</p> <p>Will the proposed project adversely impact a wilderness area?</p> <p>Ref: Wilderness Act of 1964 (16 U.S.C. 1131 et seq.), as amended.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>No. The activities proposed by this project are limited to design, auditing, and building retrofits. These activities are unlikely to adversely affect any wilderness areas in AK. Retrofit activities to the exterior of buildings located near sensitive resources shall be accompanied by pollution prevention measures.</p>
<p>15. Wild and Scenic Rivers</p> <p>Is the proposed project a "Water Resources Project" that will impact a wild, scenic or recreational river area and create conditions inconsistent with the character of the river?</p> <p>Ref: Wild & Scenic Rivers Act (16 U.S.C. 1271 et seq.), as amended.</p>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<p>No. The activities proposed by this project are limited to design, auditing, and building retrofits. These activities are unlikely to adversely affect any Wild, Scenic, or recreational rivers. Retrofit activities to the exterior of buildings located near sensitive resources shall be accompanied by pollution prevention measures.</p>



16. National Natural Landmarks Will the proposed project impact a National Natural Landmark? Ref: Historic Sites Act of 1935 (16 U.S.C. 461 et seq.), as amended.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No. The activities proposed by this project are limited to design, auditing, and building retrofits. These activities are unlikely to adversely affect any National Natural Landmarks.
17. Sole Source Aquifers If the proposed action would not have adverse effects on this resource, it may be considered that there is no Impact Potential. Ref: Safe Drinking Water Act of 1974, (42 U.S.C. 201, 300 et seq., and 21 U.S.C. 349), as amended. (See 40 CFR part 149).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No. According to the EPA website, as of 08/05/04, there are no sole source aquifers in Alaska.
18. Prime Farmlands Will the proposed project convert significant agricultural lands to non-agricultural uses? Ref: Farmlands Protection Policy Act of 1981 (7 U.S.C. 4201 et seq.), as amended. (See 7 CFR part 658).	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No. The proposed project will not occur on significant agricultural lands and will therefore not convert agricultural lands to non-agricultural uses. http://www.ak.nrcs.usda.gov/technical/soils/soilslocal.html
19. Wetlands Will the proposed project adversely affect wetlands or will there be construction in wetlands, except in conformance with a U.S. Corps of Engineers Section 404 Permit? Ref: Executive Order 11990, Protection of Wetlands	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No. Although wetlands and other Waters of the US exist in many of the communities served by this project, construction activities will be restricted to the interiors and immediate exteriors of existing buildings and no impacts to Waters of the US are expected. If it is later determined that excavation will occur in wetlands or other Waters of the US, a Section 404 of the Clean Water Act permit will be obtained. https://www.fws.gov/wetlands/data/Mapper.html
20. Floodplains Will the proposed project involve construction in a floodplain or impact floodplain development? Ref: Executive Order 11988, Floodplain Management	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Yes. Some of the communities served by this project are likely located in 100-year floodplains. Design and energy auditing actions will not affect floodplain development. Building retrofits, which will consist of standard energy efficiency improvements made to existing structures, are also expected to have no effect on floodplain development, as they will not encourage future floodplain development or put human safety, health, or welfare at risk.
21. National Monuments Will proposed project impact a National Monument?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No. The activities proposed by this project are limited to design, auditing, and building retrofits. These activities are unlikely to adversely affect any National Monuments. No because of the nature of the project scope, no National historic monuments will be affected by the project.
22. Ecologically Significant or Critical Areas Will the proposed project impact an ecologically significant or critical area?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No. The activities proposed by this project are limited to design, auditing, and building retrofits. These activities are unlikely to adversely affect any Ecologically Significant or Critical Areas.
23. Other Known Reasons Is an environmental assessment required for other known reasons?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	No.

Additional Comments

Before energy efficiency retrofits or ground excavation occurs, the Project Manager shall notify ANTHC Environmental Staff. At that time, ANTHC Environmental Staff shall determine, on a case-by-case basis, as to whether additional consultations and permits are needed.

ANTHC completed an environmental review for the energy efficiency improvements to sanitation systems in up to 35 communities that was submitted to the Denali Commission in December 2014. An additional environmental review for energy audits and energy impact assessments was submitted to the Denali Commission in February 2017.

PREPARED BY

Date 07/01/2019	Typed or Printed Name and Title Scott Prevatte, ANTHC Permitting Specialist Roger Harritt, ANTHC Cultural Resources Manager	Signature  7/1/19  7/1/2019
---------------------------	---	---

Organization: Alaska Native Tribal Health Consortium (ANTHC)

DENALI COMMISSION APPROVING OFFICIAL

Based upon the categorical exclusion identified above, this completed checklist and attachments, I certify to the best of my knowledge, that the information provided above is complete and correct, and that:

A categorical exclusion determination is appropriate for this project	Yes: <input checked="" type="checkbox"/>	No: <input type="checkbox"/>
Further environmental analysis is required	Yes: <input type="checkbox"/>	No: <input checked="" type="checkbox"/>
Date 8 July 2019	Signature 